

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

AMBAC ASSURANCE CORPORATION,

Plaintiff,

v.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO; JOSÉ B. CARRIÓN III; ANDREW
G. BIGGS; CARLOS M. GARCÍA;
ARTHUR J. GONZÁLEZ; JOSÉ R.
GONZALEZ; ANA J. MATOSANTOS;
DAVID A. SKEEL, JR.,

Defendants.

Adv. Proc. No. 20-00068 (LTS)

APPLICATION OF ELIZABETH B. PRELOGAR FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE COURT:

¹The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

COMES NOW, Elizabeth B. Prelogar, (the “Applicant”) and respectfully requests pro hac vice admission to this Court by stating as follows:

1. Applicant is an attorney and a member of the law firm of Cooley LLP., with offices at:

| | |
|---------------|----------------------------------|
| Address | 1299 Pennsylvania Ave. Suite 700 |
| | Washington, DC 20004 |
| Email | eprelogar@cooley.com |
| Telephone No. | (202) 776-2076 |
| Fax No. | (202) 842-7899 |

2. Applicant will sign all pleadings with the name Elizabeth B. Prelogar.
3. Applicant has been retained personally or as a member of the above-named firm by Ambac Assurance Corporation to provide legal representation in connection with the above- styled matter now pending before the United States District Court for the District of Puerto Rico.
4. Since 01/01/2013, applicant has been and presently is a member in good standing of the bar of the District of Columbia, where applicant regularly practices law. Applicant’s bar license number is 1011890.

5. Applicant has also been admitted to practice before the following courts:

| Court: | Admission Date: |
|--|-----------------|
| State of California | 01/06/2009 |
| Federal Circuit Court | 10/11/2012 |
| U.S. Court of Appeals for the Second Circuit (inactive) | 10/17/2012 |
| U.S. Court of Appeals for the Ninth Circuit | 10/17/2012 |
| U.S. Court of Appeals for the Circuit | 11/07/2012 |
| U.S. Court of Appeals for the Tenth Circuit | 02/11/2013 |

| Court: | Admission Date: |
|---|-----------------|
| U.S. Supreme Court | 08/02/2013 |
| U.S. District Court for the District of Columbia | 08/05/2013 |
| U.S. Court of Appeals for the D.C. Circuit | 09/30/2013 |
| U.S. District Court for the Central District of California | 02/15/2020 |
| U.S. District Court for the Northern District of California | 04/23/2020 |

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. Applicant is not a resident of the Commonwealth of Puerto Rico.

10. During the past three years, applicant has not filed for pro hac vice admission in the United States District Court for the District of Puerto Rico.

11. Local counsel of record associated with applicant in this matter is:

| | | |
|----------------|---|--|
| Name | : | Roberto A. Cámara Fuertes |
| USDC-PR | : | 219002 |
| E-mail | : | rcamara@ferraiuoli.com |
| Address | : | PO Box 195168 San Juan, PR 00919-5168 |
| Phone | : | (787) 766-7000 x 366 |
| Fax | : | (787) 766-7001 |

12. Applicant has been furnished a copy of, and has read, the Local Rules of the United

States District Court for the District of Puerto Rico² and agrees to comply with them in their entirety.

13. Applicant is further aware that such rules provide in part that attorneys appearing pro hac vice must pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the pro hac vice admission fee shall be completed either through the CM/ECF payment module (using the pay.gov portal) or by attaching a check or money order payable to "Clerk, U.S. District Court."

WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

Dated: May 29, 2020.

Elizabeth B. Prelogar
Printed Name of Applicant



Signature of Applicant

I HEREBY CERTIFY that I consent to the designation of local counsel of record for all purposes pursuant to P.R. Local Rule 83A(f).

In San Juan, Puerto Rico, this 29th day of May, 2020.

s/ Roberto A. Cámara-Fuertes
Roberto A. Cámara-Fuertes
USDC-PR No. 219002

² Latest version (with amendments through April 12, 2018) available at https://www.prd.uscourts.gov/sites/default/files/documents/ajax/Local_Rules_amended_as_of_Sept_2_2010_with_TOC%2015_0.pdf.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notification of such filing to all CM/ECF participants in this case.

In San Juan, Puerto Rico, this 29th day of May, 2020.

Ferraiuoli LLC

PO Box 195168
San Juan, PR 00919-5168
Phone: 787.766.7000
Fax: 787.766.7001

s/ Roberto A. Cámara Fuertes

Roberto A. Cámara Fuertes
USDC-PR 219002

Email: rcamara@ferraiuoli.com

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PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Adv. Proc. No. 20-00068 (LTS)

[PROPOSED] ORDER

The Court, having considered the Application of Elizabeth B. Prelogar for Admission *Pro*

³The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Hac Vice, orders that:

- ☐ the application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.
- ☐ the application be denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this _____ day of _____, _____.

LAURA TAYLOR SWAIN
U.S. DISTRICT JUDGE